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ATTORNEY FOR DEFENDANTS GREYHOUND LINES, INC. AND SABRINA ANDERSON

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMALIA ULMAN : NO.

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v. : CIVIL ACTION

:

GREYHOUND LINES, INC.; :

SABRINA ANDERSON;

FIRSTGROUP AMERICA;

HI-TECH RESOURCE RECOVERY;

C.A.V. ENTERPRISE, LLC; and AKOS GUBICA:

## **NOTICE OF REMOVAL OF DEFENDANTS**

Defendants, Greyhound Lines, Inc. and Sabrina Anderson, through their undersigned attorney, give notice of the removal of the above captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof aver as follows:

- 1. A civil action has been brought against defendants by the plaintiff in the Court of Common Pleas of Philadelphia County at No. 150903512. A copy of that Complaint is attached hereto as Exhibit "A".
- 2. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.
- 3. The plaintiff is, at the time of the filing of this action, a citizen of the State of California.

- 4. Defendant, Greyhound Lines, Inc. is a Delaware corporation with corporate headquarters located at 2221 E. Lamar Blvd., Suite 500, Arlington, Texas.
  - 5. Defendant, Sabrina Anderson is a citizen of the State of Ohio.
- 6. Defendant FirstGroup America, Inc. is an indirect, wholly owned subsidiary of FirstGroup PLC, a United Kingdom based company with United States headquarters located at 600 Vine Street, Suite 1400, Cincinnati, Ohio.
- 7. Defendant, Hi-Tech Resource Recovery is a corporation that maintains an address at 130 Verick Avenue, Brooklyn, New York.
- 8. Defendant, C.A.V. Enterprise, LLC is a corporation that maintains an address at 39 Butcher Road, Monroe Township, New Jersey.
- 9. Defendant, Akos Gubica is an individual who maintains a business address at 39 Butcher Road, Monroe Township, New Jersey.
- 10. This action is for an amount in controversy in excess of statutory jurisdictional limit for arbitration, together with costs of this action and damages for delay.
- 11. If this action had been brought here initially, the United States District Court for the Eastern District of Pennsylvania would have original jurisdiction of the subject matter under 28 U.S.C. § 1332.
- 12. A Complaint in this action was served on Defendant, Greyhound Lines, Inc. A copy of the Complaint is attached as Exhibit "A". No other process, pleadings or Orders have been served upon the defendants.

13. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted:

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: \_\_\_\_\_

PAUL C. TROY, ESQUIRE

Attorney for Defendants, Greyhounds Lines, Inc. and Sabrina Anderson